

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

| | | |
|---|---|----------------------------|
| GILBERT JAMES |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Civil Action No. 3:11cv221 |
| |) | |
| ENCORE CAPITAL GROUP, INC., <i>et al.</i> |) | |
| |) | |
| Defendants. |) | |

PLAINTIFF’S MOTION TO FILE DOCUMENTS UNDER SEAL

Plaintiff, Gilbert James, by counsel, and pursuant to Rule 5 of the Local Rules of the United States District Court for the Eastern District of Virginia and the protective order entered by this Court on August 12, 2011 (Docket 37) (hereafter “the Protective Order”), he hereby moves to file certain documents under seal. To support his motion, Plaintiff needs to file certain exhibits that were designated by the Defendants as confidential. While Plaintiff disagrees that most, if not all of the documents, information, and/or other materials contained therein are properly designated as Confidential by the Defendants, or could otherwise satisfy the high standard required in this District for sealing, Plaintiff nonetheless moves that the Court permit the filing of these exhibits under seal, until such time as the propriety of the Defendants’ designations may be ruled upon pursuant to the Special Master process established by this Court..

WHEREFORE, Plaintiff respectfully requests that the Court grant the Plaintiff’s Motion to File Documents Under Seal pursuant to the stipulated Protective Order for the reasons set forth in the memorandum of law filed contemporaneously herewith.

Respectfully submitted,
GILBERT JAMES

By: _____/s/_____
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of March, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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